

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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AMERICAN ENVIRONMENTAL  
ENTERPRISES, INC., d/b/a THE  
SAFETYHOUSE.COM,

Plaintiff,

v.

MANFRED STERNBERG, ESQUIRE, and  
MANFRED STERNBERG & ASSOCIATES, PC,  
and CHARLTON HOLDINGS GROUP, LLC, and  
SHLOMO GROSS a/k/a SAMUEL GROSS, and  
GARY WEISS, and A.SOLAR, LLC, and  
DAPHNA ZEKARIA, ESQUIRE, and  
SOKOLSKI & ZEKARIA, P.C.

Defendants

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CIVIL ACTION

No. 2:22-CV-0688 (JMY)

**NOTICE OF MOTION FOR PROTECTIVE ORDER**

**PLEASE TAKE NOTICE** that undersigned, as counsel of record for Defendants, Daphna Zekaria, Esquire and Sokolski & Zekaria, P.C. (hereinafter “Zekari Defendants”), will move this Court for a Protective Order to prohibit any party from noticing the depositions of the Zekaria defendants and/or conducting any discovery against the Zekaria defendants until a decision is made on the pending Motion to Withdraw

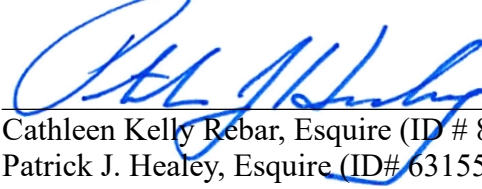
**PLEASE TAKE FURTHER NOTICE** that this motion is accompanied by a proposed form of Order.

**PLEASE TAKE FURTHER NOTICE** that Rebar Kelly reserves its right for oral argument in the event timely opposition is filed with the Court.

**PLEASE TAKE FURTHER NOTICE** that this matter has not been scheduled for trial.

**Respectfully submitted**

**REBAR KELLY**



Cathleen Kelly Rebar, Esquire (ID # 82872)

Patrick J. Healey, Esquire (ID# 63155)

470 Norristown Road

Suite 201

Blue Bell, PA 19422

(484) 344-5340

Attorneys for Defendants, Daphna Zekaria,  
Esquire and Sokolski & Zekaria, P.C.

**DATE: May 23, 2024**

**CERTIFICATE OF SERVICE**

Patrick J. Healey, Esquire, hereby certifies that a true and correct copy of the within Motion has been served upon counsel listed below by the Court's electronic filing system and via electronic mail:

Gary P. Lightman, Esquire  
***Lightman & Manochi***  
600 W. Germantown Pike  
Suite 400  
Plymouth Meeting, PA 19462

Seth L. Laver, Esquire  
***GOLDBERG SEGALLA LLP***  
1700 Market Street, Ste. 1418  
Philadelphia, PA 18103

Via electronic mail only:

Samuel Gross  
Charlton Holdings Group, LLC  
Email: [charltonholdinggroupllc@aol.com](mailto:charltonholdinggroupllc@aol.com)

Gary Weiss  
Email: [Wgary4109@gmail.com](mailto:Wgary4109@gmail.com)

Via electronic mail and overnight mail:

Daphna Zekaria, Esquire  
8 Westminster Road  
Syosset, NY 11791

**DATE:**           **May 23, 2024**

